



PLANNING STATEMENT

**PROPOSAL: CHANGE OF USE FROM A DWELLING (C3 USE) TO A 4
BEDROOM HOUSE IN MULTIPLE OCCUPATION (C4 USE)
(RESUBMISSION OF PLANNING REFERENCE: 25/0841)**

CLIENT: MR WILLIAMS - WILMONT ASSETS LTD

SITE: 7 CONWAY ROAD, NEWPORT, NP19 8PA

DATE: AUGUST 2026



CONTENTS

- 1.0 Introduction**
- 2.0 Site Description**
- 3.0 Planning Designations**
- 4.0 Proposal**
- 5.0 Planning Policy Context**
- 6.0 Planning Appraisal**
- 7.0 Conclusion**



1.0 Introduction

- 1.1 This Planning Statement has been prepared by LRJ Planning Ltd to accompany the full planning application for the change of the use of 7 Conway Road, Newport, NP19 8PA from a dwelling to a four bedroom house in multiple occupation (C4 use) (Resubmission of planning reference: 25/0841).
- 1.2 The current application has been prepared following the dismissal of the previous appeal (CAS-04803-P7G8T5). The Inspector's decision confirmed that the principle of a four-bedroom HMO at the site was acceptable and found no objection in relation to the concentration of HMOs within the area, the effect on the character of the neighbourhood, or highway and parking impacts. The appeal was dismissed solely on the basis of the internal living environment for future occupiers.
- 1.3 The Inspector identified two related concerns regarding the proposed internal layout:
 - The absence of bathroom and WC facilities on the same floor as the bedrooms, resulting in occupants having to pass through the communal kitchen and living area to access sanitary facilities; and
 - The lack of first-floor toilet facilities during a flood event, when occupants may need to remain on the upper floor in accordance with the submitted Flood Consequence Assessment.
- 1.4 These matters have been comprehensively addressed within the revised proposal.
- 1.5 The resubmitted scheme has been redesigned to provide a first-floor shower room/WC directly accessible from the bedroom accommodation. This significantly improves the day to day living conditions for future occupants by ensuring sanitary facilities are conveniently located on the same level as the bedrooms, fully responding to the Inspector's concerns regarding residential amenity.



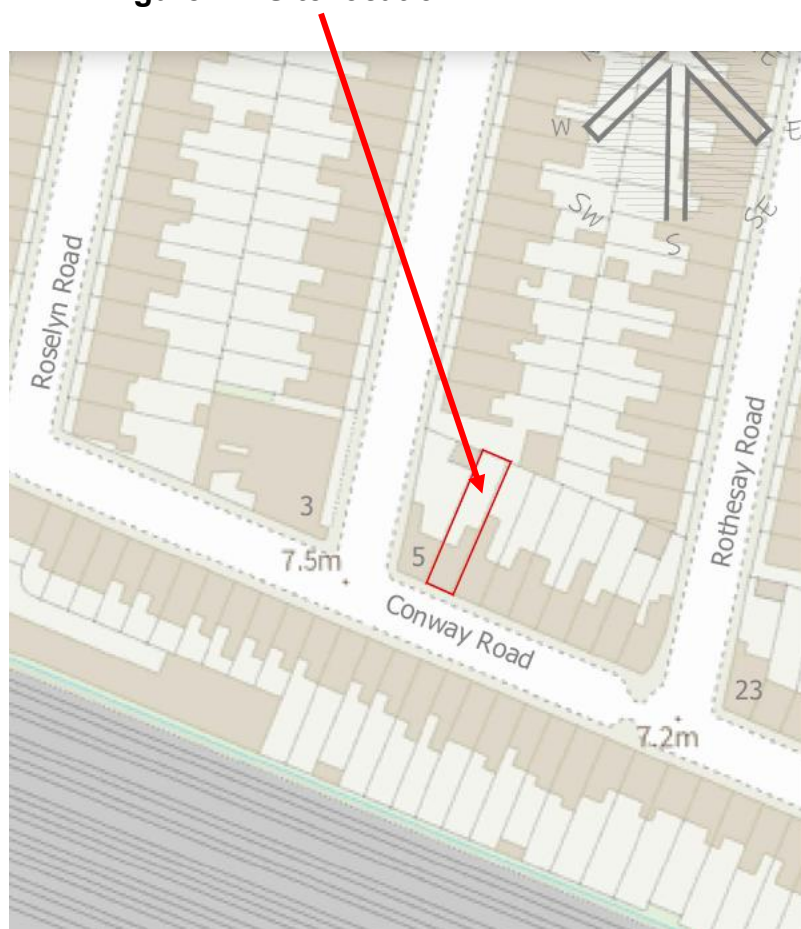
- 1.6 The revised layout also addresses the Inspector's flood resilience concerns by ensuring that toilet facilities remain available on the upper floor should occupants be required to shelter above predicted flood levels during an extreme flood event. Accordingly, the deficiency identified in the appeal decision has been removed.
- 1.7 Importantly, all other aspects of the proposal remain consistent with the conclusions reached by the Inspector. The proposal continues to fall well below the Council's 10% HMO concentration threshold, would not harm the character or balance of the local community, and remains acceptable in terms of parking, highway safety and sustainability. The only substantive issue identified in the appeal decision has therefore been resolved through the revised internal layout.
- 1.8 It is therefore considered that the reasons for the previous dismissal have been fully addressed, and the amended proposal now accords with Policies GP2, H8 and T4 of the Newport Local Development Plan, the Council's HMO Supplementary Planning Guidance, and the conclusions reached by the Inspector in all other respects.

2.0 Site Description

- 2.1 The application site comprises a two-storey terraced property, which is surrounded by properties of a similar vintage. The property itself consists of an existing four bedroom dwelling that is positioned on the northern side of Conway Road. The property benefits from a rear garden area.



Figure 1 – Site location



2.2 The property occupies a sustainable location within the settlement boundary, as well as being within walking distance of a bus route with regular services.

3.0 Planning Designations

3.1 The Site is not subject to any designations as defined by the Council's adopted Policies Map.

3.2 The Site is not within, or immediately adjacent to, designations for valued landscapes, such as local landscape designations, AONBs or National Parks.

3.3 There are no designated heritage assets within the vicinity of the site.



4.0 Proposal

- 4.1 Full planning permission is sought for the change of use of the property at 7 Conway Road, Newport, NP19 8PA from a dwellinghouse (Use Class C3) to a four-bedroom House in Multiple Occupation (HMO) (Use Class C4).
- 4.2 The proposal seeks to make efficient use of an existing residential property within a highly sustainable urban location, providing additional shared accommodation within the existing housing stock. The proposed HMO would accommodate a maximum of four residents and would not involve any external alterations to the building.
- 4.3 The proposal has been prepared having regard to the previous appeal decision relating to the property (Appeal Reference: CAS-04803-P7G8T5), which considered a proposal for the same change of use from C3 dwellinghouse to a four-bedroom HMO.
- 4.4 The previous appeal decision confirmed that the principle of HMO accommodation at this location was acceptable. The Inspector concluded that the proposal would not result in an unacceptable concentration of HMOs, would not harm the character or appearance of the area, would not result in unacceptable impacts upon neighbouring residential amenity, and would not create unacceptable highway safety impacts.
- 4.5 The appeal was dismissed solely due to concerns regarding the internal arrangement of facilities for future occupiers, specifically the absence of bathroom



facilities at first-floor level and the implications this had for the quality of accommodation and flood resilience.

- 4.6 The current proposal has been revised to directly address the matters identified by the Inspector. The proposed layout provides appropriate sanitary facilities accessible to residents at first-floor level, ensuring that occupiers have convenient access to essential facilities without the need to travel through communal kitchen and living areas. This revised arrangement improves the standard of accommodation and ensures that future residents would retain access to appropriate facilities during a flood event where refuge at first-floor level may be required.
- 4.7 The proposal therefore represents a sustainable and appropriate use of the existing building, whilst addressing the specific concerns identified within the previous appeal decision.

5.0 Planning Policy Context

- 5.1 The planning policy framework for the determination of this application is provided by the content and scope of national planning policy, which includes Planning Policy Wales (PPW) and its associated Technical Advice Notes (TANs), together with the adopted Development Plan for the area.

Planning Policy Wales

- 5.2 Planning Policy Wales promotes sustainable development and seeks to ensure that the planning system supports the delivery of appropriate housing in locations which minimise the need to travel and maximise opportunities for sustainable transport.
- 5.3 PPW identifies that planning authorities should consider the contribution that all sectors of the housing market can make towards meeting housing requirements.



This includes a range of housing types and forms of accommodation, including shared accommodation where appropriate.

5.4 PPW states:

“A broad balance between housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting.”

5.5 The proposal accords with these objectives by making efficient use of an existing residential property within an established urban area, where residents have access to local services, employment opportunities, public transport and active travel routes.

Development Plan

5.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

5.7 Part 2 (Sustainable Development) of the Planning (Wales) Act 2015 requires planning decisions to contribute towards improving the economic, social, environmental and cultural well-being of Wales in accordance with the Well-being of Future Generations (Wales) Act 2015.

5.8 The Newport Local Development Plan (LDP) to 2015 forms the adopted development plan for the purposes of determining this application. The relevant policies are:

- SP1 Sustainability;
- SP3 Flood Risk;
- GP2 General Amenity;



- GP4 Highways and Accessibility;
- H8 Self Contained Accommodation and Houses in Multiple Occupation;
and
- T4 Parking.

5.9 The Council's Supplementary Planning Guidance for Houses in Multiple Occupation (2016) provides further guidance in relation to concentrations of HMOs and identifies that applications should be considered having regard to the proportion of HMOs within a 50 metre radius. The SPG identifies a threshold of 10% above which further assessment is required.

6.0 Planning Appraisal

6.1 This section assesses the proposal against the relevant national and local planning policies and considers the key matters relevant to the determination of the application.

6.2 The main issues for consideration are:

- The principle of development and compliance with HMO policy;
- The impact upon the character and appearance of the area;
- The impact upon neighbouring residential amenity;
- The quality of accommodation provided for future occupiers;
- Parking, highways and sustainable transport considerations; and
- Flood risk.

i) Principle of Development

6.3 Both national and local planning policy support the efficient use of existing housing stock and the delivery of sustainable development within established urban areas.

6.4 Policy SP1 of the Newport Local Development Plan seeks to ensure the efficient use of land within the urban boundary and supports development proposals that contribute towards sustainable patterns of development.



6.5 Policy H8 of the LDP states that proposals for houses in multiple occupation will only be permitted where:

i) the scale and intensity of use does not harm the character of the building and locality, does not reduce neighbouring amenity, and does not result in unacceptable parking impacts;

ii) the proposal does not create an over-concentration of HMOs which would alter the character of the neighbourhood or create an imbalance in housing stock;

iii) adequate noise insulation is provided; and

iv) adequate amenity is provided for future occupiers.

6.6 The previous appeal decision is an important material consideration in assessing compliance with Policy H8. The Inspector confirmed that the principle of HMO use at this location was acceptable and that the concentration of HMOs within the surrounding area did not represent a reason for refusal.

6.7 The Council's assessment during the previous appeal identified one existing HMO within 50 metres of the appeal property, equating to a concentration of 2.6%. The proposed development would increase this to 5.3%, remaining comfortably below the 10% threshold contained within the Council's HMO Supplementary Planning Guidance.

6.8 The proposed development would therefore not result in an unacceptable concentration of HMOs or an imbalance within the local housing stock. The principle of the development is consequently acceptable.

ii) Character and Appearance

6.9 Policy GP2 of the LDP seeks to ensure that development respects the character and appearance of the surrounding area.



- 6.10 The proposal involves only a change of use and does not include any external alterations. The appearance of the property and wider streetscene would remain unchanged.
- 6.11 The previous appeal Inspector concluded that the proposed HMO use would not harm the character or appearance of the area. The current proposal therefore continues to accord with Policy GP2.

iii) Neighbour Amenity

- 6.12 Policies GP2 and H8 seek to ensure that development does not result in unacceptable impacts upon neighbouring properties.
- 6.13 The surrounding area comprises established urban residential development, predominantly consisting of terraced housing. The occupation of the property by four residents would represent a scale of occupation compatible with the existing dwelling and would not result in an unacceptable increase in activity or disturbance.
- 6.14 The previous appeal Inspector concluded that the proposed use would not result in significant adverse effects upon neighbouring amenity. The concerns commonly associated with HMO accommodation, including noise, disturbance and changes to neighbourhood character, were not considered sufficient to justify refusal.
- 6.15 The proposal therefore accords with Policies GP2 and H8 of the Newport Local Development Plan.

iv) Residential Amenity of Future Occupiers

- 6.16 Policies GP2 and H8 require development to provide an acceptable standard of accommodation and adequate amenity for future residents.



- 6.17 The previous appeal decision identified that the principal concern related to the location of bathroom facilities, with the Inspector concluding that access through communal areas did not maximise living standards for occupants.
- 6.18 The revised proposal directly addresses this matter by retaining the existing ground floor bathroom provision and introducing additional first-floor sanitary facilities. This arrangement ensures that future residents have convenient access to appropriate bathroom facilities from the bedroom accommodation, whilst also retaining flexibility and improving the overall functionality of the property. The provision of bathroom facilities at both ground and first-floor levels avoids the previous concern regarding reliance upon access through communal kitchen and living areas and ensures an improved standard of residential amenity for future occupiers.
- 6.19 The proposed accommodation provides four bedrooms together with shared kitchen, dining and living facilities. The rear garden provides appropriate external amenity space together with opportunities for bin and cycle storage.
- 6.20 The revised layout therefore overcomes the specific concern identified within the previous appeal decision and provides an acceptable standard of accommodation consistent with Policies GP2 and H8.

v) Parking and Sustainable Transport

- 6.21 The property does not benefit from off-street parking provision. However, the previous appeal Inspector considered this matter in detail and concluded that the sustainable location of the property, together with the characteristics of HMO occupation, outweighed the technical shortfall against adopted parking standards.
- 6.22 The site is located close to Chepstow Road, local shops, schools, district centres and public transport services. Walking, cycling and public transport therefore provide realistic alternatives to private car use.



- 6.23 The submitted parking survey demonstrates that available on-street parking capacity exists within the surrounding area. The previous Inspector accepted the methodology and findings of the parking survey and concluded that the proposal would not result in unacceptable highway safety impacts.
- 6.24 The proposal therefore accords with the sustainable transport objectives of Planning Policy Wales and Policies GP4 and H8 of the Newport Local Development Plan.

vi) Flood Risk

- 6.25 The site is located within an area identified as being at risk from flooding. A Flood Consequences Assessment has been submitted in support of the application.
- 6.26 The previous appeal Inspector confirmed that the change of use itself would not increase flood risk compared with the existing residential use. The concern raised related specifically to ensuring access to sanitary facilities during a flood event.
- 6.27 The revised layout addresses this matter through the provision of first-floor sanitary accommodation, ensuring that future occupiers retain access to essential facilities where refuge at first-floor level may be required.
- 6.28 The proposal therefore provides an appropriate response to flood risk and accords with Policy SP3 of the Newport Local Development Plan.

7.0 Conclusion

- 7.1 This Planning Statement has demonstrated that the proposed change of use of 7 Conway Road, Newport from a dwellinghouse (C3) to a four-bedroom House in Multiple Occupation (C4) represents an appropriate and sustainable form of development.
- 7.2 The previous appeal decision relating to the property confirmed that the principle of HMO accommodation was acceptable and that the proposal would not result in



unacceptable impacts in relation to HMO concentration, character, neighbour amenity or highway safety.

- 7.3 The current proposal has been revised to address the sole reason for dismissal identified by the Inspector, namely the arrangement of bathroom facilities and the implications for future occupier amenity and flood resilience. The revised layout provides improved living conditions and ensures appropriate access to essential facilities.
- 7.4 The proposal represents the efficient use of existing housing stock within a highly sustainable urban location. The absence of off-street parking is justified by the accessibility of the site, availability of sustainable transport alternatives and the findings of the submitted parking survey.
- 7.5 The development would not harm the character of the area, neighbouring residential amenity, highway safety or flood risk management. It would provide additional housing choice and contribute positively to the sustainable delivery of accommodation within Newport.
- 7.6 Overall, having regard to the development plan, national planning policy and the material considerations arising from the previous appeal decision, the proposal complies with the relevant planning policy framework. Accordingly, planning permission should be granted.